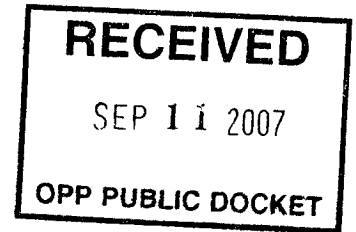


A

**OCHOCO IRRIGATION DISTRICT**  
**1001 NW Deer Street**  
**Prineville OR 97754**  
Phone (541)447-6449 – Fax (541)447-3978



September 4, 2007

Office of Pesticide Programs (OPP) Regulating Docket # 7502  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington DC 20460-0001

Re: Docket I.D. No. EPA-HQ-OPP-2007-0588

On behalf of Ochoco Irrigation District (O.I.D.), I would like to submit the following comments concerning use of Magnacide H Herbicide (Acrolein) in our district's canals. Ochoco Irrigation District supplies irrigation water to over 20,000 acres through a system of approximately 150 miles of canals and laterals. The District is also responsible for supplying water for municipal and industrial use. No domestic use of O.I.D. water is allowed.

O.I.D. uses Magnacide H as part of our on going operations and maintenance program during irrigation season. It is safe to say without the use of some form of aquatic weed eradication, water deliveries would come to a standstill. Aquatic vegetation would over take the canals to a point of clogging, and overtopping of water would take place. The district has tried various methods to combat this situation, including mechanical cleaning, which is not feasible in our district as many of our canals are lined with clay to prevent seepage. Mechanical cleaning is difficult, as in most cases the operators can not see what they are doing and have to clean by feel. This results in gouging and damaging to the canal seal and structure resulting in seepage. Also mechanical cleaning brings on a whole new set of issues, as sedimentation and vegetation are now stirred up only to float down the system and clog pump stations.

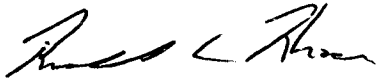
In the 16 years I have been associated with O.I.D., I know of no issues concerning the use of Magnacide H. Our applicators are licensed and trained yearly in the safe use of this product. Applicators follow the label, regulations and other laws pertaining to the use of this product.

I know of no birds or animals affected by our treatments. An occasional fish may be killed as a result of treatment, but it would not have survived as canals are de-watered approximately 5 months a year. In observation, acrolein applied in O.I.D. canals, only

seems effective from the 6 to 10 mile range depending on flow, vegetation, temperature and rate applied. O.I.D. knows of no crop damage as a result of the use of this product.

In closing, O.I.D. takes herbicide use very seriously. Every effort is made to insure safe use and application of this product. Without Magnacide H water delivery would be increasingly difficult and very expensive.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Rhoden". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Russell Rhoden, Manager  
Ochoco Irrigation District